



3. Also, Petitioners do not wish to consider that the simple shielding already inherent in systems such as metal enclosures, building and vehicular surfaces, equipment cabinets, intrinsically and extrinsically grounded systems, etc. will likely provide more than adequate protection for their specified electric field strength magnitude of 100,000 Volts per meter.

4. Also, existing standards (other than perhaps an IEC standard) were proclaimed inadequate with respect to protection of non-defense/national security systems. Only one commenter, Dr. William Radasky, with perhaps employment interest and technical competence in its investigation, has stated that in his opinion, only an IEC standard that he is responsible for is adequate. Nothing has been stated for the record what the claimed inadequacies of existing ATIS or ANSI/IEEE standards are. Are there test results or empirical studies that support the inadequacies? If so, have the predictions or better yet, demonstrations of these inadequacies been presented to and critiqued by competent peers? Please provide the Commission and the myriad of commenters with the citations so that we may understand what the real inadequacy issues are. Perhaps we will yet see a relevant magnitude and duration for the phenomenon itself!

5. As I have stated previously, in order to ensure fair consideration of all interests, whether they be consumer, manufacturer, user or government, the standards and methodologies for remediation of the effects of such phenomena should be left to ANSI/IEEE and the IEC. Both institutions support forums where the results of studies, experience and investigations can be objectively presented, reviewed and defended so as to avoid the burden suggested by Petitioners of seemingly arbitrary standards which are not based upon sound scientific principles.

6. The Petition should be dismissed since it has not demonstrated by any reasonable scientific or technical basis that insufficiencies or inadequacies in protection exist in presently installed facilities. Certainly not sufficiently to warrant the physical and economic disruption nor the potential compromise in reliability to the national infrastructure caused by the massive replacement and retrofit demanded by the Petitioners.

Respectfully Submitted,

(electronically)

/s/

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